

RESPONSES TO REVIEW COMMENTS
Interim Record of Decision
Anaconda Copper Mine Site
Arimetco Facilities Operable Unit 8
Heap Leach Pads and Fluids Management System
Lyon County, Nevada

Responses to Amy Legare, Agency Name Comments, dated May 19, 2017					
Specific Comments					
Item	Section	Pg	Par	Comments	Responses
1	2.1.1	2-1	1	Is this for sure? DR: YES.	This statement is correct.
2	2.1.3	2-7	5	What was decided? Add it here. DR: => CBI, CAN YOU MAYBE HAVE JIM SICKLES ADDRESS THIS? I ASSUME THE REFERENCED DOCUMENT CAN BE FOUND ON THE SHAREPOINT SITE, OR ELSE GET IT FROM JERYL.	The proposed reuse put forward was that the site be used for mining, if that was found to be feasible, or for the following uses: light industrial; industrial; commercial-primarily offices; recreational specifically for off-road vehicle or motor-cross. They also suggested it be used for solar power generation if possible. The site is zoned Industrial with no residential uses by Lyon County.
3	2.2.1.2	2-19	5	Please explain what minor exposure is. DR: => CBI ADDRESS. JG: Previous response may suffice.	Reworded from minor exposure to “significantly less than other evaluated receptors”
4	2.2.1.4	2-21	1 Bullet 2	Should these be the same depth? DR: => CBI ADDRESS JG: The way I interpret the HHRA is Surface is 0.25-0.75 fbgs, and mixed zone is 0-117 fbgs.	The text will be edited to indicate surface material is 0.25 to 0.75 feet bgs and mixed zone material is 0 to 117 feet bgs. There should be no subsurface material category.
5	2.2.1.4	2-22	8	I’m confused. Total risk is from one HLP? This is within the risk range. No trigger for action. DR: JERYL IS ADDRESSING THIS QUESTION OF TRIGGER FOR ACTION. AN EDIT MAY NEED TO INCORPORATED HEREIN TO HELP ADDRESS THE COMMENT, AS WELL AS IN ANOTHER SECTION THAT DISCUSSES JUSTIFICATION FOR TAKING ACTION.	JG: As far as a trigger for action, it is more than risk that drives action. In this case, it is the drain down fluids, capacity issues, stormwater routing and storage feasibility, etc: these are all interwoven, and closing just some of the HLPs poses practical issues beyond the scope of an HHRA or ERA.
6	2.2.1.4	2-22	9	Was risk calculated using Rad risk calculator?	Risk from exposure to radionuclides was calculated using an

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				DR: => CBI ADDRESS	excel spreadsheet, not the rad risk calculator.
7	2.2.1.4	2-22	9	<p>This is the trigger for action. But only for these HLPs. What is trigger for action on the rest of the HLPs?</p> <p>DR: JERYL IS ADDRESSING THIS ISSUE OF TRIGGER FOR ACTION.</p> <p>See above response.</p>	Please see response to Comment #5 above.
8	2.2.1.4	2-23	11	<p>I'd prefer you use this reference: JADA 2016 The pH of Beverages in the United States.</p> <p>DR: OK, => CBI CAN GO AHEAD AND MAKE THIS EDIT.</p>	Reference has been updated as noted.
9	2.2.1.4	2-23	13	<p>Why onions? Just curious.</p> <p>DR: BECAUSE THEY WERE GROWN IN ADJACENT FIELD.</p>	Onions were collected and analyzed because they were grown in the field adjacent to the site.
10	2.2.1.5	2-25	6	<p>Very unusual to underestimate. Risks are generally overestimated. Is this covered in the uncertainty section? How have we compensated for underestimating risk?</p> <p>DR: => CBI, CAN YOU ADDRESS?</p>	<p>The discussion regarding underestimation of risk is under the uncertainty analysis section of HHRA summary in the ROD. As discussed above (responses to Christine's comments 3 and 4), chemical uranium and TPH compounds were not included in the risk assessment calculation but would have insignificant effects on the hazard indices if they were included.</p> <p>Default exposure durations for a construction worker and off-site resident were used in the risk calculations but a comment on the BHHRA requested we look at the results if longer exposure durations occurred. These results are only presented in the uncertainties section.</p>
11	2.3	2-26	2 List Item 2 2 nd Par	<p>I did not see numbers in a table, only check marks for COCs</p> <p>DR: I'M NOT SURE WHAT SHE IS SAYING HERE. SINCE JERYL IS FOCUSING ON THIS AREA, LETS SEE IF HE CAN LOOK INTO THIS COMMENT.</p>	JG: She needs to tell us what table she is looking at.

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12	2.3	2-27	3 List Item 3 3 rd Par	<p>Do we need this twice?</p> <p>DR: FOR REASON GIVEN FOR NOT WANTING TO DELETE THINGS AS RECOMMENDED BY CHRISTINE, I DON'T WANT TO CHANGE THIS EITHER.</p>	
13	2.4.1.4	2-33	2	<p>We are Superfund. Need statements that remedy will be protective under CERCLA.</p> <p>DR: JERYL, ADD "AND IS PROTECTIVE UNDER CERCLA."</p> <p>JG: I'm okay with adding that phrase.</p>	
14	2.4.1.4	2-36	3 Bullet 12 Dash 1	<p>Why can't this be decided now? What did the public say?</p> <p>DR: WE FELT THIS WAS A MINOR ISSUE THAT COULD BE DESIGNED EITHER WAY, AND DIDN'T WANT TO FOCUS ON THAT QUESTION DURING THE FS, WHERE WE HAD MANY MORE IMPORTANT ISSUES TO ADDRESS.</p> <p>JG: I agree with Dante's response.</p>	
15	2.4.1.4	2-36	4	<p>Are there covers on the E-cells? Don't see it in the figure. How will eco exposure be eliminated?</p> <p>DR: => CBI, CAN YOU TRY TO ADD CLARIFICATION SOMEONE TO ANSWER THIS QUESTION?</p> <p>JG: No, I don't think we need to answer it. Way too much detail for a ROD, when we don't have all the design questions posed and answered yet.</p> <p>CBI: because it is a risk issue, not purely design, we believe the comment should be addressed and the answer is provided in the FFS.</p>	<p>The following text has been added:</p> <p>placing a fine-grained alluvium over the E-cell backfilled pond surface,</p>

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16	2.5.2	2-42	5	Please name the statute for each reference in this paragraph	Closure requirements are generally cited in NAC445A.350-447, and NAC519A.010-345
17	2.5.6	2-45	4	Please explain the challenge.	This statement has been deleted.
18	2.6	2-47	2	What are these?	Mine-related materials has been changed to “low grade ores”.
19	2.7	2-48	3	Are eco risks lumped for all heaps?	Ecological risks were presented in the SLERA where maximum concentrations were used. The HLPs were not evaluated separately.
20	2.7	2-48	3	No risk for these heaps so what is basis for covers.	Please see response to Christine’s comment #5
21	2.7	2-48	3	Non-cancer risk for these heaps.	Comment noted
22	2.8	2-50	3	Cover this in terms of complying with an ARAR. We need to be in SF world.	A statement has been added that the selected remedy will comply with CERCLA.
23	2.8.2	2-52	2	So precipitated solids are different than “solids generated by fluids evaporation . . .” See highlight on pg 41? JG: No, they are the same but I don’t see a different language on pg. 41.	The text has been revised to state “solids generated by fluids evaporation “ for consistency.
24	2.8.3.2	2-53	3	Nevada should have identified ARARs. No?	Nevada has been added to the list of agencies. My subsequent response changed the names of the agencies to “The agencies”. Anywhere BLM & EPA remain in the ROD, without NDEP, we should just make this change.

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Responses to Christine Poore, Agency Name Comments, dated May 22 and 23, 2017					
Specific Comments					
Item	Section	Pg	Par	Comments	Responses
1	2.1.3	2-7	4	Has formal consultation on the ROD been conducted with each of the tribes? Doesn't have to be in the document, but I'm interested. DR: YES, FORMAL CONSULTATION CONDUCTED WITH BOTH TRIBES, ON PROPOSED PLAN.	Yes, formal consultation was conducted with both of the tribes on the Proposed Plan.
2	2.1.5.7	2-15	5	Are these part of this OU? Please clarify. DR: => CBI, YOU CAN ADD CLARIFYING WORDING.	The text has been revised as follows: As a consequence, this interim ROD does not address other pollutant and contaminant sources in OU-8 related to the SX/EW Plant and the historical spill areas
3	2.2	2-17	4	Please reference the table that shows this risk. DR: => CBI CAN DO.	Tables that show risk from the Screening Level Human Health Risk Assessment are located in Appendix H of the Remedial Investigation Report. CH2M HILL, 2008 (July). Tables 1-1, 1-2, 1-4, and 1-5.
4	2.2	2-18	6	Page 2-15 describes this area as needing additional characterization, but this states that there is no risk in that area. Please be consistent DR: => JERYL, CAN YOU ADDRESS THIS, OR ELSE PROVIDE CBI SOME GUIDANCE ON HOW TO LOOK THIS UP AN ADDRESS?	The sentences says the SX/EW Process Area were within the 10-6 to 10-4 cancer risk range. It does not say "no risk". In addition, the following sentence states that the Soil exceeded an HI of 1 for residential and industrial exposures which is generally considered a risk. JG: I don't see the discrepancy and don't know how to resolve.
5	2.2	2-18	6	Residential? Industrial? Please describe. DR: => CBI CAN ADDRESS.	Text will be updated to state "The cumulative cancer risk for potential exposure to groundwater under a residential scenario exceeded 10-4 cancer risk."
6	2.2.1.1	2-18	1	Why 10-6 and not 10-4?	The methodology for selecting COCs is usually set

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				DR: => CBI, I'M THINKING CAN TAKE A SHOT AT ADDRESSING THIS, SINCE THEY HAD HELPED FINALIZE THE HRA AND ARE FAMILIAR WITH THE DOCUMENT.	conservatively at a cancer risk level of 10^{-6} to account for multiple contaminants at a site and/or multiple pathways of exposure, as recommended in the NCP [40 CFR 300.430(e)(2)(i)]. This approach ensures that when risks from all contaminants and pathways are added together, the total risk will not exceed 10^{-4} .
7	2.2.1.1	2-18	1	What is background? Is background above ARARs? DR: => CBI ADDRESS ALSO.	For the purpose of comparing site-related risks to risks from exposure to natural, background levels of chemicals, the background soil data referenced in the <i>Background Data Summary Report, Yerington Mine Site, Revision 1</i> (ARC, 2009) for two subareas (Subarea A-1 and Subarea A-2) were used in this BHHRA. The background soil samples were collected at 2 to 10 inches bgs and 2 to 3 ft bgs. The only background concentrations that are greater than residential RSLs are arsenic and chromium (comparing to the RSL for hexavalent chromium).
8	2.2.1.2	2-19	4	Why not dermal contact as well? Please discuss. DR: => CBI ADDRESS. JG: Probably deemed minor due to no physical access for trespassers.	A prerequisite for absorption across the outer layers of the skin is dissolution of the metals (mercury, for example) in water or sweat. If absorption of metals through the skin were to occur, absorption is most likely to occur through pores in the skin (estimated to comprise less than 1% of total body surface (EPA 1992). If a child were to sweat profusely (1/2 liter of sweat) and 1% of mercury in the 0.5 liters is absorbed, one can estimate a "worst-case" for this potential exposure route. Having 0.5 liters of sweat in contact with exposed areas of the body at all times is highly unlikely as the sweat will either evaporate or drip from the body. Applying these exposure assumptions and given the predicted solubility of mercury under conditions that would maximize solubility in sweat suggests a dermal absorption that is almost 1000 times less than predicted intakes from

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					the oral route. Therefore, it is unlikely that the dermal route can be a significant contributor.
9	2.2.1.2	2-19	6	<p>Were food sources included? Please discuss.</p> <p>DR: CBI ADDRESS.</p> <p>JG: Food sources? What food? I don't see how food sources can possibly be applicable to OU-8.</p>	<p>No, food sources were not included. Food sources would not grow on HLP material. In addition, animals, including wild game, may wander in the OU-8 area. However, the exposure pathways involving ingestion of wild game or other biota by receptors outside of OU-8 remain incomplete because there is no forage on HLPs for consumption by wild game and animals do not consume liquids from ponds in OU-8 (<i>Remedial Investigation Report Arimetco Facilities Operable Unit 8, Anaconda-Yerington Copper Mine, Yerington, Nevada, CH2M HILL, 2011</i>).</p>
10	2.2.1.4	2-21	1 Bullet 1	<p>What about the top 6 inches? Is this the material that receptors are most likely exposed to? Please discuss.</p> <p>DR: => CBI ADDRESS</p> <p>JG: The way I interpret the HHRA is Surface is 0.25-0.75 fbgs, and mixed zone is 0-117 fbgs.</p>	<p>The text will be edited to indicate surface material is 0.25 to 0.75 feet bgs and mixed zone material is 0 to 117 feet bgs. There should be no subsurface material category.</p>
11	2.2.1.4	2-21	4	<p>Please provide a source for this information.</p> <p>DR: CBI, CAN YOU SEE IF THE HRA HAS A CITATION FOR THIS? IF NOT, ARE YOU FAMILIAR WITH A SOURCE FOR THIS COMMONLY-USED STATEMENT?</p>	<p>The following reference will be added: American Cancer Society. 2016. Lifetime Risk of Developing or Dying from Cancer. www.cancer.org/cancerbasics/lifetime-probability-of-developing-or-dying-from-cancer.</p>
12	2.2.1.5	2-24	2	<p>If there isn't data for the site, how is it identified as a COC? Please discuss.</p> <p>DR: => CBI, CAN YOU ADDRESS?</p>	<p>Text has been updated from Radium-226 data is not available "for Site" to Radium-226 data is not available for HLP materials. Radium-226 was detected in draindown solutions. Radium was not identified as a COC in HLP materials (see HHRA Table 7-2).</p>
13	2.2.1.5	2-24	3	<p>Why? Don't we usually take a conservative approach? Please discuss.</p>	<p>Because there is a great deal of uncertainty with converting radionuclide forms of uranium to chemical uranium,</p>

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				DR: => CBI, CAN YOU ADDRESS?	chemical uranium was not evaluated in the risk calculations. However, the conversion was performed and shows that the omission of chemical uranium is not significant to the hazard index.
14	2.2.1.5	2-24	4	Why not? Please discuss. DR: => CBI, CAN YOU ADDRESS?	Because of the uncertainty between the forms of TPH analyzed for (TPH-diesel, TPH-kerosene, and TPH-motor oil) and the forms of TPH for which there are toxicity information for (TPH-aromatics (medium), TPH-aliphatics (medium), and TPH-aromatics (high), TPH was not evaluated in the risk calculations. However, surrogates were assigned for the uncertainties section discussion and the results indicated that the omission of TPH is not significant to the hazard index.
15	2.3	2-26	2	There isn't an identified risk for all of the HLPs, but should be covered for other reasons. Please consider including an RAO to prevent creation of drain down fluid to provide the basis for addressing all of the HLPs. DR: JERYL, PLEASE ADDRESS.	JG: I'm okay with adding another RAO if this is not considered a major revision that would require additional review time, etc. It makes sense to have another RAO, along the lines of Reduce or minimize volumes of drain-down fluids accumulating in the FMS. CBI: what do you guys think about this? Discuss??
16	2.3	2-26	2	These all appear to be containment RAOs, should there be one for treatment? Let's discuss. DR: JERYL, SEE IF YOU CAN ADDRESS.	JG: I agree, but EPA wanted treatment left in as it is standard language. So, I think we leave as is.
17	2.3	2-26	2 List Item 1 3 rd Par	Don't need this here, recommend deleting. DR: JERYL, WHAT DO YOU THINK?	JG: I think they need to remain. Can't change the RAOs now.
18	2.3	2-26	2 List Item 2 2 nd Par	This shouldn't be in the RAO, please clarify elsewhere. DR: TO THE EXTENT THAT THESE WERE THE RAO'S THAT WERE STATED IN THE FS, FOR WHICH WE EVALUATED THE ALTERNATIVES AND WENT OUT TO THE PUBLIC IN THE PROPOSED PLAN, I AM NOT	

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				KEEN ON CHANGING THEM AROUND NOW. JG: I agree.	
19	2.3	2-26	2 List Item 2 3 rd Par	Don't need this here, recommend deleting. DR: SAME COMMENT AS ABOVE.	
20	2.3	2-27	3 List Item 3 2 nd Par	Please clarify if it also meets the 1986 federal guidelines for GW classification. DR: => CBI, IS THIS SOMETHING YOU ARE FAMILIAR WITH AND CAN ADDRESS? COULD PUT AS FOOTNOTE.	The following text was added to the sentence (and the reference added to the reference list): consistent with Class II groundwater under federal guidelines (EPA, 1986)
21	2.3	2-27	3 List Item 3 3 rd Par	Don't need this here, recommend deleting. DR: I DON'T WANT TO DELETE FOR REASON STATED ABOVE.	
22	2.4	2-27	--	For all alternatives please include the time to construct, time to meet RAOs, and a breakdown of cost (or reference the appropriate table). DR: => CBI CAN ADD.	
23	2.4.1.2	2-28	1	Why does alternative 2 not need a stormwater management system, particularly given that the entire HLP aren't covered? Please discuss. DR: => CBI, I THINK YOU GUYS KNOW ENOUGH ABOUT THE HISTORY OF THE SITE RI/FS BY NOW TO ADDRESS THIS. (I.E. THE STORMWATER MGMT SYSTEM WAS ADDED ON LATE, SO IT WAS ONLY ADDED ONTO THE ALTERNATIVE THAT WAS ADDED LATE.	Alternatives 1, 2, and 3 were developed as a part of the original FS. The primary upgrade to the FMS considered in the FS was perimeter ditch upgrades. In 2015, a Focused Feasibility Study (FFS) was prepared for the State of Nevada under which Alternative 4 was developed by combining Alternatives 6a and 8a from the original FS and provide some additional components such as the E-cells and the enhanced stormwater management system. This new alternative was then added to the original FS, but the original alternatives were not updated to include enhancements from Alternative 4 (FS Alternative 6a/8a). The descriptions of the alternatives have been updated to clarify any upgrades included to the FMS and stormwater

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					management systems.
24	2.4.1.2	2-29	2 Bullet 3 Dash 3	How? Prevent digging? Please discuss. DR: => CBI, PLEASE ADD SOME SIMPLE WORDING IN PARENTHESIS, LIKE (PREVENT DIGGING THROUGH CAP, DAMAGING POND LINERS, ETC.)	The following text has been added to the bullet: (such as preventing intrusive activities through the camp and pond liners).
25	2.4.1.2	2-30	2 Bullet 10	Why a 2 foot thickness here and 4 feet over the HLPs? Are there different risks/requirements? DR: JERYL WILL ADDRESS THE CAP THICKNESS ISSUE. JG: purpose of 4-ft thick cap of HLPs is to further reduce infiltration; that is not needed for pond covers, where we are only concerned about protective caps, not at reducing infiltration.	
26	2.4.1.2	2-30	2 Bullet 11	RCRA C? Please discuss. DR: => CBI, CAN YOU ADDRESS?	CB&I suggests JERYL handle this comment. The Nevada regulatory requirements for disposal of mine related wastes are complicated. Several types of wastes are covered by RCRA while others are not. We suggest having a state regulators prospective on this comment.
27	2.4.1.3	2-32	3 Bullet 6	Formatting is off here. DR: => CBI CAN ADDRESS, AS THEY WILL BE DOING FINAL WORD PROCESSING ETC.	Format corrected.
28	2.4.1.3	2-33	4	This is nearly identical to the previous alternative. Please discuss the impacts of regrading and capping all of the HLPs versus just the decks. DR: => CBI ADDRESS.	The text for both of the alternatives referenced in this comment have been modified for clarification.
29	2.4.1.4	2-33	1	This sort of hangs out there. Requirements to... DR: => CBI, JUST DELETE "IN ACCORDANCE WITH CERCLA AND NCP REQUIREMENTS."	The text has been deleted.

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30	2.4.1.4	2-33	2	<p>Is this a different type of cover? Why only two feet and not four? Is this why a stormwater management system is needed for this alternative and not the other two? Please discuss.</p> <p>DR: JERYL WILL ADDRESS.</p> <p>JG: my response is to handle this via email with no change to the ROD wording. We can discuss this with HQ Friday, or email exchanges.</p>	
31	2.4.1.4	2-33	2	<p>If it's a thinner cap, why have a steeper grade? Please discuss.</p> <p>DR: JERYL WILL ADDRESS.</p> <p>JG: Two things here: they missed the concepts of "minimum", and "or shallower".</p>	
32	2.4.1.4	2-33	2	<p>What would happen to remaining material after reprocessing? Please discuss.</p> <p>DR: JERYL CAN ADDRESS.</p> <p>JG: this was intentionally general, not specific. Specifics will be discussed during design phase, not in the ROD.</p>	
33	2.4.1.4	2-34	3 Bullet 1 Dash 1	<p>The comparative analysis indicates that the FMS system will get a much larger upgrade under alt 4 versus 2/3, but that isn't clear here. Please discuss and be consistent.</p> <p>DR: => CBI CAN ADDRESS.</p> <p>JG: I don't think CBI needs to address this. Again, the specifics will be determined during design phase not specified in the ROD.</p>	A brief description of the upgraded FMS system has been added to this bullet with reference to later discussions. In addition, the upgrades to the FMS for alternatives 2 and 3 have been clarified.

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34	2.4.1.4	2-34	3 Bullet 6 Dash 1	<p>Why were these not included in previous alternatives? Seems like they'd be appropriate for all of them.</p> <p>DR: => CBI ADDRESS.</p> <p>JG: Again, CBI does not need to address this. It's obvious that the earlier alternatives were not worked up to the same level of consideration and engineering detail as Alt 4 was</p>	See Response to CP Comment No. 23.
35	2.4.1.4	2-34	3 Bullet 7	<p>This isn't described as an ET cap as the others are. Is it? Please clarify.</p> <p>DR: => CBI ADDRESS.</p> <p>JG: again, CBI should not need to address this. We intentionally left this cover description general or vague so that engineering methods could be determined during design phase.</p>	It has been noted in the text that this is also an ET cap.
36	2.4.1.4	2-34	3 Bullet 7 Dash 1	<p>Again, I'm having trouble seeing the basis for different thickness in caps if they're both ET caps. Since decreasing generation of drain down fluids is critical to this alternative I'm having trouble understanding why this ET cap is less robust than the other alternatives that include additional basins. Please discuss.</p> <p>DR: JERYL ADDRESS.</p> <p>JG: same response as previously; design criteria to be discussed during design phase.</p>	
37	2.4.1.4	2-34	3 Bullet 7 Dash 1	<p>Additionally, I'm sure this is a big difference in cost so better understanding why a 2-ft cap is better than a 4-ft cap is important.</p> <p>DR: JERYL ADDRESS.</p>	

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				JG: same response as previous.	
38	2.4.1.4	2-35	3 Bullet 9	<p>Is this needed because of the type of cap? If not, why wasn't it included in the other alternatives? Please discuss.</p> <p>DR: JERYL SHOULD EXPLAIN.</p> <p>JG: no explanation, same response as some of the previous. To reiterate, earlier alternatives did not dive into the stormwater issues as thoroughly as the Alt 4 CCP.</p>	<p>CBI suggested Response:</p> <p>See Response to CP Comment No. 23. In addition, the following has been added to the text:</p> <p>Because this alternative was added to the FS based on the 2015 FFS, a new stormwater management system was included in the alternative while upgrades for Alternatives 2 and 3 from the original FS provide only upgrades to the existing ditch system.</p>
39	2.4.1.4	2-35	3 Bullet 10	<p>Please provide a more detailed description of E-cells.</p> <p>DR: => CBI ADDRESS.</p>	A detailed description of the E cells has been added.
40	2.4.1.4	2-35	3 Bullet 11 Dash 1	<p>What are the closure requirements associated with this?</p> <p>DR: JERYL, CAN YOU ADDRESS?</p> <p>JG: see citation.</p>	Closure requirements are cited in NAC445A.350-447, and NAC519A.010-345
41	2.4.1.4	2-36	3 Bullet 12 Dash 1	<p>Why aren't we choosing one now? What will be the basis for the decision? What's the cost difference? Please discuss.</p> <p>DR: SAME ANSWER AS TO AMY'S COMMENT.</p> <p>JG: again, I agree with Dante's response.</p>	
42	2.4.2	2-36	1 Bullet 2	<p>Alt 2 doesn't contain as much as alt 3 or 4. The approach is the same, but the extent is different.</p> <p>JG: No response is probably best here. Obviously the non-covered side slopes will not be as stable or contain as much as Alts 3 and 4. If you're going to make all the alternatives function alike why even have alternatives to discuss?</p>	<p>The following text has been added to the bullet:</p> <p>(a top deck cover under Alternative 2 and a complete cover under Alternatives 3 and 4)</p>

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43	2.5.1	2-39	3	For alternatives 2, 3, and 4, please state if they are protective (y/n), then compare. Since this is a threshold criterion, an alternative can't be selected if it doesn't meet this	Agreed. The text has been modified as requested.
44	2.5.1	2-39	3	You can't tell the differences in the FMS upgrades in the descriptions of the alternatives. Please discuss in the descriptions.	See Response to PC Comment No. 33.
45	2.5.1	2-40	5	Alternative 2 included a 4-foot cover, but Alternative 4 has a 2-foot cover. Please elaborate on how they are the same. JG: next sentence provides the reasons.	JERYL He is addressing previous comments on this topic
46	2.5.1	2-40	5	You can't tell the differences in the FMS upgrades in the descriptions of the alternatives. Please discuss in the descriptions. JG: Maybe CBI can provide these details, although my preference is to not dive into the details in the ROD, but wait for design discussions. The ROD is not meant to provide an engineering level of detail. CBI: not additional details were provided. The text was revised to clarify what are considered upgrades to FMS under each alternative.	See Response to PC Comment No. 33.
47	2.5.2	2-42	5	If they don't meet ARARs (or ARARs aren't waived), they can't be selected. Please be clear which alternatives will meet ARARs and which will not.	CB&I still compiling response
48	2.5.2	2-42	5	They won't be closed in compliance with ARARs in alt 2? I didn't get that from the description of alternatives. Please be clear and consistent.	Same as above

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49	2.5.2	2-42	6	Recommend discussing LDRs and how they will be met.	Recommend JERYL address. LDRS are only applicable if these are considered a RCRA waste under State regulations. LDRs were not mentioned in the FS, CCP, or Proposed Plan. Recommend not discussing them in the ROD either. Complicated regulations with overlap between Mining regs and RCRA regs.
50	2.5.4	2-44	2	Will the remaining material be more toxic? How will it be addressed to prevent risk? Please discuss.	The following text has been added: however, the drain-down fluids have low pH and contain high concentrations of metals, inorganics, and radionuclides
51	2.5.4	2-44	3	The description of alternatives doesn't describe alt 4 as an ET cover. Please be consistent.	The description of Alternative 4 in Section 2.4.1.5 has been clarified to indicate the cap is an ET cover.
52	2.5.5	2-44	--	The time to meet RAOs for each alternative isn't provided in the document. Please include it in the descriptions of alternatives and in the sort-term effectiveness discussion.	The time to achieve RAOs has not been calculated. The following text has been added to the description of the alternatives: The time required to meet RAOs is site specific. Based upon industry standards, achieving RAOs is anticipated to require 1.5 to 3 pore volumes through the HLPs, with the timeframe to be specified during design. The text for short-term effectiveness has not been modified.
53	2.5.9	2-46	4	What does this add to the doc? Also – all comments, including these, were responded to in the RTC, correct?	This statement has been deleted. The following has been added to the text: “that were addressed in the Response to Comments”
54	2.6	2-47	2	What about the E cells? Will they require excavation/disposal as part of O&M?	The E-cells are anticipated to remain operational during the 30 year O&M period included in the ROD. The text has not been modified.
55	2.7	2-49	8	This language is a bit confusing since the ROD is selecting the remedy, and this makes it appear that part of the remedy will be selected in design. Please revise. Also – if a decision will be made later, suggest providing a decision	The text has been changed to “preparation of the detailed design”.

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				tree or info on how that decision will be made. JG: could change preferred to final or specific.	
56	2.8.2	2-51	2	Recommend using the word “will” for consistency. JG: okay	Agreed. The text has been revised as requested.
57	2.8.2	2-52	2	Won’t these materials be addressed during disposal? Please discuss. We shouldn’t be selecting a remedy that leaves risks unaddressed.	The text has been revised to state “could present exposure risks to human and ecological receptors until construction is complete and the HLPs are covered.”
58	2.8.2	2-52	3	Please include a sentence on what isn’t being addressed now, but will be addressed in the final ROD for this OU.	The following text has been added: It does not address the pollutant and contaminant sources associated with the SX/EW Plant and the historical spill areas. The contaminated groundwater associated with the Arimetco facilities will be addressed as part of the RI/FS and remedial actions for site wide groundwater contamination in OU-1. Further study is required to define the nature and extent of contamination derived from the SX/EW Plant and historical spill areas and will be included in the final ROD for this OU.
59	2.8.3.1	2-52	1	Recommend using the word “will” for consistency.	Agreed.
60	2.8.3.1	2-52	1	Previous page indicates that risk will remain. Please be consistent.	Please see response to CP Comment No. 57.